

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNION INSURANCE COMPANY)
)
)
Plaintiff,) Case No.: 4:22-cv-01180-AGF
)
)
v.)
)
CSAC, INC.; and SADE M.)
CRAWFORD,)
)
Defendants.)

JOINT PROPOSED SCHEDULING PLAN

Pursuant to Federal Rule of Civil Procedure 26(f) and the Court's Rule 16 Order (ECF No. 43), and having met and conferred regarding the above-captioned lawsuit, the parties, by and through counsel, jointly propose to the Court the following scheduling plan:

- a. This case has been assigned to Track 2 (Standard), which the parties believe is appropriate.
- b. All motions for joinder of additional parties or amendment of pleadings shall be filed no later than **September 26, 2023**, to permit initial discovery on potential additional claims.
- c. Discovery shall be conducted as follows:
 - i. The parties do not anticipate issues related to electronically stored information. In the event any party has discoverable information that is electronically stored, counsel will work together to reach agreements for the disclosure of such information.

ii. The Federal Rules of Evidence shall apply to claims of privilege. The Federal Rules of Civil Procedure shall apply to trial preparation material. No other agreements are in place at this time for asserting claims of privilege or of protection of trial-preparation materials.

iii. The parties shall exchange the initial disclosures required by Fed. R. Civ. P. 26(a)(1) by **August 23, 2023**.

iv. The parties agree that discovery need not be conducted in phases or limited to certain issues.

v. The parties do not anticipate the need for experts. However, in the event experts are required, the Parties shall disclose all expert witnesses and shall provide reports required by Fed. R. Civ. P. 26(a)(2) no later than **January 19, 2024**, and shall make experts available for deposition no later than **March 1, 2024**. A Party may designate any rebuttal expert by **March 1, 2024**, and make any rebuttal experts available for deposition no later than **March 29, 2024**.

vi. The presumptive limits of ten (10) depositions per side as set forth in Fed. R. Civ. P. 30(a) (2) (A), and twenty-five (25) interrogatories per party as set forth in Fed. R. Civ. P. 33 (a), should apply in this case.

vii. No physical or mental examinations of the parties are anticipated.

viii. All discovery shall be complete by **March 29, 2024**.

ix. Motions to compel shall be pursued in a diligent and timely manner, but in no event filed later than **February 29, 2024**.

d. The parties agree that this case is appropriate for mediation and shall be submitted to mediation on or before **March 29, 2024**.

e. Any motions to dismiss, motions for summary judgment, motions for judgment on the pleadings, or any motions to limit or exclude expert testimony must be filed no later than **May 14, 2024**. Opposition briefs shall be filed no later than **June 14, 2024**. Any reply brief may be filed no later than fourteen days following the response brief, or **June 28, 2024**.

f. The earliest date by which this case should reasonably be expected to be ready for trial is **September 2024**.

g. The parties estimate the length of time expected to try the case to verdict to be three to four (3-4) days.

WHEREFORE, the Parties pray this Court adopt this Joint Proposed Scheduling Plan, and for any other relief as this Court deems proper.

Respectfully submitted,

**TRAUB LIEBERMAN STRAUS &
SHREWSBERRY, LLP**

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 19, 2023, the foregoing was filed electronically with the Clerk of Court, therefore to be served electronically by operation of the Court's electronic filing system upon all counsel of record.

/s/ Jason M. Taylor
